

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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G & G Closed Circuit Events LLC,

Plaintiffs,

-against-

Ashleigh Bertolini, individually, and
GLO 718 Corp. d/b/a PARQ

**DECLARATION OF
EMMANUEL COLON**

Case No.: 1:21-cv-07351-VSB

Defendants.

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Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I, Emmanuel Colon, manage the bar PARQ, a defendant in this lawsuit.
2. On May 4, 2019, the Saul Alvarez v. Daniel Jacobs, WBA/WBC/IBF World Middleweight Championship fight program (the “Program”) was displayed in the bar PARQ via a Smart TV.
3. The Smart TV has Internet capability that supports direct streaming of movies and other programs.
4. The Smart TV was connected to PARQ’s Internet router.
5. The Program was shown on the Smart TV via the application DAZN, an application that allows user to watch boxing matches. DAZN was accessible from the Smart TV, and that is how the Program was shown in the bar.
6. At no time did the Smart TV use a cable service or a satellite dish to stream the Program.

Dated: December 2, 2022



Emmanuel Colon